

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 21-cr-10015-FDS
)	
JOHNATHAN TAYLOR,)	
)	

MOTION FOR STATUS CONFERENCE/REMOTE PROCEEDING

Counsel for the defendant in the above-captioned matter hereby moves this Honorable Court to convert the in-person plea hearing currently scheduled for Wednesday, April 6, 2022, to a remote status conference conducted by telephone conference or via Zoom video conference. The defendant understands he has a right to have this hearing conducted in person, has consulted with defense counsel regarding that right, and consents to having this hearing conducted remotely. *See* United States District Court for the District of Massachusetts, General Orders 22-3 and 22-4.

As grounds for this motion counsel states that an evaluation report was recently completed by an expert hired by the defense and the parties would like an additional thirty days to discuss his conclusions prior to conducting a plea hearing.

Assistant United States Attorney, Anne Paruti-Lohnes assents to this request.

Respectfully submitted,

JONATHAN TAYLOR

By his attorney,

/s/ Oscar Cruz, Jr.

Assistant Federal Public Defender

Federal Public Defender Office

51 Sleeper St., 5th Floor

Boston, MA 02210

617-223-8061

Dated: April 4, 2022

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served upon all parties as indicated on the Notice of Electronic filing (NEF) on April 4, 2022.

/s/Oscar Cruz, Jr. _____

Assistant Federal Public Defender